



United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

February 19, 2025

# MEMO ENDORSED.

## VIA ECF

The Honorable Ona T. Wang  
United States Magistrate Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007

Re: *New York Legal Assistance Grp. v. Soc. Sec. Admin.*, 23 Civ. 9363 (ALC) (OTW)

Dear Judge Wang:

This Office represents the Social Security Administration (the “SSA”) in the above-captioned action brought by plaintiff New York Legal Assistance Group (“NYLAG”) pursuant to the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”), and the Administrative Procedure Act, 5 U.S.C. § 702 (“APA”). I write respectfully on behalf of both parties to request an adjournment of the March 4, 2025, conference and February 25, 2025 deadline to file a proposed agenda for the conference. (ECF No. 52).

As background, the parties appeared before the Court for a status conference on December 4, 2024. (ECF No. 50). Following that status conference, the Court ordered the parties to appear for another status conference on March 4, 2025, and to file a joint proposed agenda for the conference by February 25, 2025. (ECF No. 52).

The reason for the requested adjournment is that counsel for the Government is going to be on trial beginning March 4, 2025, lasting potentially through March 7, 2025. NYLAG joins in this request because NYLAG has a Third Circuit argument for another matter that was recently scheduled for March 4, 2025.

Counsel for both parties are available anytime during the weeks of March 10 and March 17, 2025, if a date during those weeks would be convenient for the Court. The parties will submit a proposed agenda for the conference one week in advance of any date on which the Court chooses to reset the conference.

Application **GRANTED**. The conference currently scheduled for Mar. 4 is adjourned to March 11, 2025, at 12:00 p.m. The joint proposed agenda is due one week in advance.

**SO ORDERED.**

Ona T. Wang  
U.S.M.J.

Feb. 20, 2025

Respectfully,

MATTHEW PODOLSKY  
Acting United States Attorney for the  
Southern District of New York

By: /s/ Tara Schwartz  
TARA SCHWARTZ  
Assistant United States Attorney  
86 Chambers Street, Third Floor  
New York, NY 10007  
Tel.: (212) 637-2633  
Email: tara.schwartz@usdoj.gov

cc: Plaintiff (via ECF)